

LAW OFFICE OF ROBERT MARINELLI
305 BROADWAY, 10th Floor
NEW YORK, NY 10007

Time Records for Natifah Cooper v. City of New York et als., 14-CV-6136

Date	Activity	Hours	Rate	Amount
4/24/13	telephone call with client	0.3	425	127.50
4/29/13	telephone call with client	0.4	425	170.00
5/28/13	Meeting with client	1.4	425	595.00
6/1/13	Meeting with witnesses	1	425	425.00
7/25/13	telephone call with client	0.3	425	127.50
9/26/13	prepare releases and retainer	0.4	425	170.00
9/26/13	Meeting with Client	1.2	425	510.00
11/14/13	telephone call with client	0.2	425	85.00
1/22/14	telephone call with client	0.2	425	85.00
3/26/14	telephone call with client	0.2	425	85.00
4/10/14	telephone call with client	0.3	425	127.50
7/2/14	Meeting with client	1.2	425	510.00
10/19/14	Prepare complaint	2.1	425	892.50
10/20/14	prepare summonses and civil cover page	0.4	425	170.00
10/20/14	File Summons and Complaint	0.3	425	127.50
12/1/14	Prepare initial disclosures and DRIs	1.9	425	807.50
12/4/14	Phone w/client	0.1	425	42.50
12/4/14	Phone w/defense counsel	0.1	425	42.50
12/7/14	phone w/client	0.3	425	127.50
12/10/14	Review File, take notes	1.3	425	552.50
12/15/14	Letter to Court	0.4	425	170.00
2/6/15	email exchang w/defense counsel	0.2	425	85.00
3/6/15	email to defense counsel	0.2	425	85.00
5/7/15	Review File in Preparation for Initial Conference	0.3	425	127.50
5/7/15	Travel to Initial Conference	0.5	212.5	106.25
5/7/15	Appear at initial conference	1	425	425.00
5/7/15	Return from Initial Conference	0.5	212.5	106.25
5/7/15	review Court Order	0.2	425	85.00
5/8/15	telephone call with client	0.3	425	127.50
5/15/15	email exchange w/defense counsel	0.4	425	170.00
6/5/15	email to defense counsel	0.1	425	42.50
6/7/16	Phone with witness	0.4	425	170.00
6/17/15	email exchang with defense counsel	0.2	425	85.00
6/18/15	email exchange with defense counsel	0.2	425	85.00
6/18/15	Phone w/defense counsel	0.2	425	85.00
6/18/15	Phone with client	0.3	425	127.50
6/18/17	Review File in Preparation for Discovery Responses	1.4	425	595.00
6/18/15	Prepare discovery responses	1.9	425	807.50
6/19/15	Joint letter to Court	0.5	425	212.50
6/23/15	email to defense counsel	0.1	425	42.50
7/2/15	email to defense counsel	0.1	425	42.50

Date	Activity	Hours	Rate	Amount
7/6/15	email exchange with defense counsel	0.2	425	85.00
7/12/15	Joint letter with Court	0.1	425	42.50
7/15/15	email to defense counsel	0.3	425	127.50
7/16/15	Prepare amended complaint	1.3	425	552.50
7/29/15	email to defense counsel	0.2	425	85.00
8/5/15	email to defense counsel	0.1	425	42.50
8/14/15	email to defense counsel	0.1	425	42.50
8/17/15	email exchange with defense counsel	0.2	425	85.00
8/18/15	Review status letter by defense counsel	0.1	425	42.50
9/14/15	Status letter to Court	0.5	425	212.50
9/23/15	email exchange with defense counsel	0.2	425	85.00
9/23/15	phone with defense counsel	0.2	425	85.00
9/25/15	email to defense counsel	0.2	425	85.00
9/29/15	Phone w/client	0.3	425	127.50
9/30/15	prepare notices of deposition	0.4	425	170.00
10/1/15	Review discovery and prepare deficiency letter	3.6	425	1,530.00
10/1/15	emails to defense counsel	0.2	425	85.00
10/5/15	email to defense counsel	0.1	425	42.50
10/6/15	review motion for extension	0.2	425	85.00
10/16/15	email to defense counsel	0.1	425	42.50
10/19/15	email exchange with defense counsel	0.2	425	85.00
10/21/15	email exchange with defense counsel	0.3	425	127.50
10/22/15	Prep plaintiff for deposition	2	425	850.00
10/23/15	email to defense counsel	0.1	425	42.50
10/23/15	Attend Plaintiff's deposition	1.5	425	637.50
10/23/15	Pasynkov's Deposition	1.4	425	595.00
12/1/15	email to defense counsel	0.1	425	42.50
12/4/15	email to defense counsel	0.1	425	42.50
12/4/15	review Court Order for hearing and Order to show cause	0.2	425	85.00
12/4/15	Research possibility of sanctions against defense counsel, review other case	2.3	425	977.50
12/4/15	email to defense counsel	0.1	425	42.50
12/4/15	telephone w/ACC	0.2	425	85.00
12/6/15	meeting with ACC	0.7	425	297.50
12/7/15	telephone call with ACC	0.1	425	42.50
12/8/15	Meeting with ACC	1.1	425	467.50
12/9/15	Court appearance -OTSC	1	425	425.00
12/14/15	email exchange with acc	0.2	425	85.00
12/15/15	Dieugenia prep w/RL	2.4	425	1,020.00
12/16/15	email exchange w/acc	0.3	425	127.50
12/17/15	email exchange w/acc	0.3	425	127.50
12/16/15	Prep for Dieugenia deposition with RL	2.1	425	892.50
12/18/15	Dieugenia deposition	1.5	425	637.50
1/7/16	review plaintiff's deposition	2.4	425	1,020.00
1/9/16	Meet with plaintiff	1.1	425	467.50
2/16/16	email to acc	0.1	425	42.50
2/17/16	Review Ds letter for a pre-motion conference	0.6	425	255.00
2/6/16	email to ACC	0.1	425	42.50
2/18/16	Review Court order for a settlement conference	0.1	425	42.50

Date	Activity	Hours	Rate	Amount
2/23/16	phone conversation with ACC	0.1	425	42.50
2/24/16	review court order granting adjournment	0.1	425	42.50
3/3/16	Attend Settlement conference	1	425	425.00
3/11/16	phone w/Court re: settlement offer and review court order	0.3	425	127.50
3/15/16	Research and write Plaintiff's response to Ds pre-motion conference reques	3.1	425	1,317.50
3/16/16	email to ACC	0.1	425	42.50
3/17/16	email exchange w/acc	0.3	425	127.50
3/23/16	email exchange w/ ACC	0.3	425	127.50
3/23/16	Review Ds request for adjournment	0.2	425	85.00
3/23/16	email exchange w/acc	0.4	425	170.00
3/24/16	Review Ds answer to amended complaint	0.4	425	170.00
3/30/17	email to ACC	0.1	425	42.50
4/1/16	Review Ds motion to adjourn conference	0.2	425	85.00
4/4/16	Review Court Order	0.1	425	42.50
4/25/16	Prepare for pre-motion conference	1.2	425	510.00
4/26/16	Travel to and from conference	1	212.5	212.50
4/26/16	Attend pre-motion Conference	0.5	425	212.50
5/4/16	Letter to Court	0.6	425	255.00
5/16/16	Review Ds letter to Court	0.2	425	85.00
6/7/17	Meet with DM about case	1	425	425.00
6/9/16	Review and edit DMs draft, research Ds Motion for SJ, Rule 56.1 statement,	5.8	425	2,465.00
6/10/16	Shepardize Ds Cases, edit motion	3.1	425	1,317.50
6/11/16	Legal research for opposition to Ds motion for summar judgment, Edit DM	2.1	425	892.50
6/12/16	Meet with DM re: motion	1.2	425	510.00
6/12/16	Review and annotate deposition testimony and record for motion	4.1	425	1,742.50
6/14/16	Meet w/DM re: motion	0.5	425	212.50
6/14/16	Review and edit DMs 56.1 statement and memorandum	6.1	425	2,592.50
6/15/16	Continue and edit 56.1 and memorandum	7.6	425	3,230.00
6/18/16	Meet w/DM re: case	0.5	425	212.50
6/19/16	Complete 56.1. memorandum and motion, adit and revise	4.8	425	2,040.00
6/19/16	Meet w/DM re: motion	0.5	425	212.50
6/20/16	Edit all portions of MSJ, check research, shepardize cases	6.6	425	2,805.00
6/29/16	Review Ds reply to Ps response	1.4	425	595.00
9/11/16	Phone with client	0.2	425	85.00
11/14/16	Phone with client	0.3	425	127.50
2/28/17	Review Court's decision on SJ	1.6	425	680.00
3/3/17	Conversation with client	0.4	425	170.00
3/13/17	email exchange with acc	0.4	425	170.00
3/30/17	email to acc	0.1	425	42.50
4/1/17	Review and edit DMs JPTO	1.9	425	807.50
4/4/17	email exchange with ACC/call with plaintiff	0.1	425	42.50
4/12/17	email from ACC	0.1	425	42.50
4/12/17	email exchange with ACC	0.2	425	85.00
4/18/17	email to ACC	0.1	425	42.50
5/2/17	Prepare for Pretrial Conference, review file, police documents	3.8	425	1,615.00
5/3/17	Phone with client and witnesses	0.7	425	297.50
5/4/17	Travel to Court	0.5	212.5	106.25
5/4/17	Pretrial Conference	1.2	425	510.00

Date	Activity	Hours	Rate	Amount
5/4/17	Travel back from Court	0.5	212.5	106.25
5/4/17	Phone w/client	0.5	425	212.50
5/16/17	Letter to Court	0.4	425	170.00
5/18/17	Review Deopsitions of Defendants, annotate	2.1	425	892.50
5/25/17	Letter to Court	0.3	425	127.50
6/20/17	Letter to Court	0.3	425	127.50
8/9/17	Review Ds Motions in Limine, Notice of Motion, take notes, Shepardize case	5.1	425	2,167.50
8/13/17	Research Cases for Response	3.4	425	1,445.00
8/14/17	Letter to Court	0.4	425	170.00
8/15/17	Reply to MIL	4.2	425	1,785.00
8/21/17	Research cases, Reply to MIL, Edit, check	4.6	425	1,955.00
9/8/17	Email exchange w/ACC	0.4	425	170.00
9/12/17	Email exchange w/ACC	0.3	425	127.50
9/13/17	Review Court Order MIL, shepardize cases	1.3	425	552.50
9/14/17	Review Defendants' Proposed Jury Charge	5.1	425	2,167.50
9/15/17	Research Proposed Jury Charge, Research Ds JC	4.2	425	1,785.00
9/15/17	Prepare Plaintiff's proposed Jury Charge	5.2	425	2,210.00
9/16/17	review depositions Plainitff, Dieugenia	6.1	425	2,592.50
9/18/17	Review Joint Proposed Jur Charge	2.8	425	1,190.00
9/18/17	Research and compile Proposed Voir Dire	3.9	425	1,657.50
9/19/17	Review Natifah's Deposition	4.2	425	1,785.00
9/19/17	Telephone call with Natifah	0.4	425	170.00
9/19/17	Review Ds Proposed Voir Dire	1.1	425	467.50
9/19/17	Prepare So Ordered Subpoena for Medical Records	0.6	425	255.00
9/20/17	Email exchange w/ACCs	0.9	425	382.50
9/20/17	Phone w/ ACC	0.2	425	85.00
9/20/17	Letter to Court Re: Medical Records	2.6	425	1,105.00
9/20/17	Review Plaintiff's deposition, annotate	2.2	425	935.00
9/21/17	Review depositions, prepare for cross Dieugenia	6.6	425	2,805.00
9/21/17	Review Depositions, Strategize	1.9	425	807.50
9/22/17	review deposition, prepare for cross- Pasynkov	6.9	425	2,932.50
9/22/17	Review Discovery responses	2.3	425	977.50
9/23/17	Take notes for opening, closing contents, strategize	3.2	425	1,360.00
9/23/17	Pacer searches for Officer witnesses, google searches etc.	1.1	425	467.50
9/23/17	Phone with client	0.5	425	212.50
9/24/17	Review Court Decisions, Paperwork and Depositions in Preparation for conf	2.4	425	1,020.00
9/25/17	Travel to Court	0.5	425	212.50
9/25/17	Attend Court Conference	1.5	425	637.50
9/25/17	Travel back from Court	0.5	425	212.50
9/25/17	Trial preparation	2.6	425	1,105.00
9/25/17	Review email from ACC	0.2	425	85.00
9/26/17	Review Paperwork, Review and annotate Medical Records	3.4	425	1,445.00
9/26/17	review and edit letter re: OGA and Resisting	4.5	425	1,912.50
9/27/17	review depositions Pasnykov, Dieugenie, prep for examinations	7.4	425	3,145.00
9/28/17	Prepare Opening, plan closing	6.1	425	2,592.50
9/28/17	Prepare for cross examinations, review cross reference depositions, police p	4.2	425	1,785.00
9/29/17	Prepare summation	3.1	425	1,317.50
9/29/17	Review Paperwork, depositions	3.1	425	1,317.50

Date	Activity	Hours	Rate	Amount
9/30/17	Meet with Drei, Discuss strategy, direct Cooper	1.4	425	595.00
10/1/17	Review Paperwork, Medical Records, research drugs and definitions	3.1	425	1,317.50
10/1/17	Preparing Kosterkin's Direct	5.1	425	2,167.50
10/1/17	Meet with Kosterkin	2.4	425	1,020.00
10/1/17	Review Exhibits	2.2	425	935.00
10/2/17	Write Notes and Practice Opening	1.8	425	765.00
10/2/17	Travel to Court	0.5	425	212.50
10/2/17	trial	6	425	2,550.00
10/2/17	travel back from court	0.5	212.5	106.25
10/2/17	Review File	1.1	425	467.50
10/2/17	Prepare for Brofsky's Cross	2.1	425	892.50
10/2/17	Prepare Summation	2.6	425	1,105.00
10/3/17	Prepare for Irina Kosterkin's Direct	4.1	425	1,742.50
10/3/17	Travel to Court	0.5	212.5	106.25
10/3/17	trial	7	425	2,975.00
10/3/17	Travel Back from Court	0.5	212.5	106.25
10/3/17	Research Jury Charge	3.1	425	1,317.50
10/3/17	Phone with Michael Lumer re: Jury Charge and QI	0.6	425	255.00
10/4/17	Travel to Court	0.5	212.5	106.25
10/4/17	trial	8	425	3,400.00
10/4/17	travel back from court	0.5	212.5	106.25
10/4/17	Research Qualified Immunity and Special Verdict Sheet	4.1	425	1,742.50
10/5/17	Travel to Court	0.5	425	212.50
10/5/17	Trial	4	212.5	850.00
10/5/17	Travel from Court	0.5	425	212.50
10/5/17	Research Case Law - Judgments	0.6	425	255.00
		309.9	425	129,688.75

Preparing Motion for Fees

12/14/17	Research casess upporting hourly Rate, lodestar	1.3	425	552.50
12/15/17	Motion for Fees, argument	4	425	1,700.00
12/17/17	Motion for Fees, argument	3	425	1,275.00
12/21/17	Motion for Fees, argument	2	425	850.00
12/22/17	Prepare affadavit and Declaration in support	3.6	425	1,530.00
12/23/17	Draft and Revise	1.1	425	467.50
12/26/17	Draft and Revise; conduct legal research; review, edit, amd finalize fee moti	5.9	425	2,507.50
		20.9	425	8,882.50
Grand Total				138,571.25